

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

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JESSE PIERCE and MICHAEL PIERCE,	)	
on behalf of themselves and all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No.: 3:13-cv-00641-PLR-DCP
	)	
WYNDHAM VACATION RESORTS,	)	
INC., and WYNDHAM VACATION	)	
OWNERSHIP, INC.,	)	
	)	
Defendants.	)	

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**MOTION TO QUASH SUBPOENAS**

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Jackson Lewis P.C., Wyndham Vacation Resorts, Inc., and Wyndham Vacation Ownership, Inc. (hereinafter “Movants”) hereby submit this Motion to Quash Subpoenas seeking the production of timekeeping records and invoices relating to Jackson Lewis P.C.’s representation of Defendants. As described in more detail in the attached Memorandum, the Subpoenas at issue suffer from a multitude of critical deficiencies. The Subpoenas are untimely because discovery is closed and briefing on Plaintiffs’ underlying motion for attorneys’ fees is practically complete. Only *Plaintiffs’* attorneys’ fees are at issue in this case. By demanding information regarding *Defendants’* attorneys’ fees, the Subpoenas seek information which is neither relevant nor proportional to the needs of the case. The Subpoenas also seek privileged

information and provide insufficient time to respond. The Court should quash the Subpoenas for all of these reasons.<sup>1</sup>

Respectfully submitted,

s/ O. John Norris, III

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*ATTORNEYS FOR MOVANTS*

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<sup>1</sup> Nevertheless, each issue raised by Movants is an independent ground for quashing the Subpoenas, and the Court need not rule on every issue if it finds one basis to quash.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 24<sup>th</sup> day of April, 2018, electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send an electronic notification of such filing to the following:

Martin D. Holmes (TN Bar No. 012122)  
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s/ O. John Norris, III \_\_\_\_\_